

CODE: 3980  
DEMETRAS LAW  
J. Craig Demetras  
Nevada Bar. No. 4246  
230 E. Liberty Street  
Reno, NV 89501  
(Telephone): 775-348-4600  
[jcd@demetraslaw.com](mailto:jcd@demetraslaw.com)  
[mail@demetraslaw.com](mailto:mail@demetraslaw.com)

Attorney for Plaintiffs BrandStorm, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

**BRANDSTORM, INC., a California  
Corporation**

Case No.: 3:19-CV-00315-MMD-CLB

**Plaintiffs,**

VS

GLOBAL STERILIZATION AND  
FUMIGATION, INC., a Nevada  
Corporation, BRYAN GARDNER, an  
individual, and DOES 1-10, Inclusive,

#### Defendants.

**STATUS REPORT AND STIPULATION FOR ORDER TO EXTEND DISCOVERY**

## **DEADLINES**

Plaintiff, BRANDSTORM (“BrandStorm”), by and through its counsel, J. Craig Demetras of Demetras Law, and Defendant GLOBAL STERILIZATION AND FUMIGATION, INC. (“Global”), by and through its counsel, Stephen Castronova of Castronova Law Offices, hereby stipulate and agree to stay the Discovery deadlines in this case pending resolution of the lawsuit pending before Judge Hicks, *Global Insurance and Fumigation, Inc. et al v. Admiral Insurance Company*, District of Nevada Case Number 3:20-

1 cv-00444-LRH-WGC, a liability insurance coverage dispute. In support of the Stipulation, the  
2 parties represent as follows:

- 3 1. In this action, Brandstorm has filed suit against Global and Mr. Gardner seeking to  
4 recover for damages to a food product that Brandstorm had hired Global to process.
- 5 2. Brandstorm made a claim under made a claim under Global's general liability policy,  
6 Admiral Insurance Company, wherein Global sought both a defense and indemnity  
7 from the suit for itself and Mr. Gardner.
- 8 3. Based upon Admiral's refusal to provide a defense or indemnity for Global in this  
9 action, Global filed a lawsuit which is currently pending before Judge Hicks, *Global*  
10 *Sterilization and Fumigation, Inc. et al v. Admiral Insurance Company*, District of  
11 Nevada Case Number 3:20-cv-00444-LRH-WGC.
- 12 4. In this action, pursuant to a stipulation filed by the parties, the court has set a date of  
13 February 28, 2022 for the filing of a Pre-Trial Order. Due to the pending motions for  
14 summary judgment in the ongoing Insurance Action, it is unclear if the Defendant's  
15 insurance company will provide a defense and/or settlement funds for the Defendant in  
16 this case.
- 17 5. Admiral Insurance Company filed a Motion for Summary Judgment in the insurance  
18 action on July 7, 2021 and Global filed its Opposition To Motion for Summary  
19 Judgment on July 28, 2021. Admiral filed its Reply on August 11, 2012.
- 20 6. Global filed its Motion for Partial Summary Judgment on September 30, 2021.  
21 Admiral filed its Response on October, 19, 2021. Global filed its Reply on November  
22 2, 2021
- 23 7. The District Court's resolution of the issues presented in the Motions for Summary  
24 Judgment in the Insurance Litigation will have a substantial effect on this action going  
25 forward.
- 26 8. No trial dates have been set for either action.

9. The parties believe it is necessary to resolve the pending matters in the Insurance Action to allow the parties in this Action to plan for completion of discovery, to work on settlement negotiations, and to allow all parties to avoid continuing and unnecessary litigation costs.

Based upon the foregoing, the parties hereby agree to stay discovery and all other deadlines, including but not limited to, completion of fact discovery, the filing of any dispositive motions, and the filing of the joint pretrial pending the Court's resolution of the Motions for Summary Judgment in the Insurance Action.

**AFFIRMATION PURSUANT TO NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

## IT IS SO STIPULATED.

Dated: March 22, 2022

Dated: March 22, 2022

DEMETRAS LAW

CASTRONOVA LAW OFFICES

By: /s/ J. Craig Demetras  
J. CRAIG DEMETRAS  
Nevada Bar No. 4246  
230 E. Liberty Street  
Reno, NV 89501  
Tel.: 775-348-4600  
Attorneys for Plaintiffs

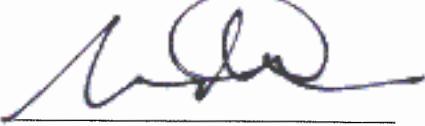
By: /s/ Stephen Castronova  
Stephen Castronova  
Nevada Bar No. 7305  
605 Forest Street  
Reno, NV 89509  
Tel.: 775-323-2646  
Attorneys for Defendants

1  
2                   **ORDER**  
3

4                   Upon consideration of the Parties Joint Stipulation to Extend Discovery Deadlines,  
5  
6                   IT IS HEREBY ORDERED that Discovery and all other deadlines in this matter are  
7                   hereby stayed until resolution of the Insurance Action.  
8

9  
10                  **IT IS SO GRANTED.**

11  
12                  Dated: March 24, 2022.  
13



DISTRICT COURT JUDGE

14                  Respectfully Submitted By:  
15                  DEMETRAS LAW

16                  By: /s/ J. Craig Demetras  
17                   J. CRAIG DEMETRAS  
18                   230 E. Liberty Street  
19                   Reno, NV 89501  
20                   Attorney for Plaintiffs

21  
22  
23  
24  
25  
26  
27  
28